

EXHIBIT D

From: [Cottreau, Steven \(Litigation-WAS\)](#)
To: [Carter, Sean](#)
Cc: rhaefele@motleyrice.com; juanmorillo@quinnemanuel.com; [Barlow, Katie \(Litigation-WAS\)](#)
Subject: Re: Call
Date: Wednesday, April 19, 2017 4:48:44 PM

Sean,

We would be happy to do so if the agreement is reciprocal so that you do the same, and we can go forward as planned in 2 weeks. We propose that the two sides exchange documents and topics by email at the end of next week.

Best,
Steve

On Apr 19, 2017, at 4:42 PM, Carter, Sean <SCarter1@cozen.com> wrote:

Steve – Would you be willing to identify the subject matter areas you intend to cover in the proposed deposition, and to identify in advance any documents you intend to use? Thanks, Sean



Sean P. Carter
Member | Cozen O'Connor
One Liberty Place | 1650 Market Street, Suite 2800 | Philadelphia, PA 19103
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From: steve.cottreau@cliffordchance.com [<mailto:steve.cottreau@cliffordchance.com>]
Sent: Wednesday, April 19, 2017 2:37 PM
To: Carter, Sean <SCarter1@cozen.com>
Cc: rhaefele@motleyrice.com; juanmorillo@quinnemanuel.com; Katie.Barlow@CliffordChance.com
Subject: RE: Call

Yes. Let's use this dial in:

United States : +1-866-592-5236
Conference code: 6107700891

From: Carter, Sean [<mailto:SCarter1@cozen.com>]
Sent: Wednesday, April 19, 2017 14:28
To: Cottreau, Steven (Litigation-WAS)
Cc: Haefele, Robert
Subject: Call

Steve – Received your voicemail. Can Bob Haefele and I call you at 3?

Sean P. Carter
Member | Cozen O'Connor
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